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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**NOTICE OF FILING OF PROPOSED ORDER
AUTHORIZING THE FILING OF CERTAIN INFORMATION UNDER
SEAL IN CONNECTION WITH THE REPLY IN FURTHER SUPPORT OF THE
REQUESTING HOLDERS' MOTION FOR ENTRY OF AN ORDER DIRECTING
THE APPOINTMENT OF AN OFFICIAL PREFERRED EQUITY COMMITTEE**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

PLEASE TAKE NOTICE that on October 19, 2022, the *Requesting Holders’ Motion for Entry of an Order Authorizing the Filing of Certain Information Under Seal in Connection with the Reply in Further Support of the Requesting Holders’ Motion for Entry of an Order Directing the Appointment of an Official Preferred Equity Committee* [ECF No. 1118] (the “Motion”) was filed.

PLEASE TAKE FURTHER NOTICE that Community First Partners, LLC, Celsius SPV Investors, LP, Celsius New SPV Investors, LP, and CDP Investissements Inc., hereby file a *Proposed Order Authorizing the Filing of Certain Information Under Seal in Connection with the Reply in Further Support of the Requesting Holders’ Motion for Entry of an Order Directing the Appointment of an Official Preferred Equity Committee*, attached hereto as **Exhibit A** (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that copies of the Motion, the Proposed Order, and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/celsius>. You may also obtain copies of the Motion and other pleadings filed in these chapter 11 cases by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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Dated: October 19, 2022
New York, New York

/s/ Dennis F. Dunne

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Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
CELSIUS NETWORK LLC, <i>et al.</i> , ¹)	Case No. 22-10964 (MG)
)	
Debtors.)	(Jointly Administered)
)	

**ORDER AUTHORIZING THE FILING OF CERTAIN INFORMATION
UNDER SEAL IN CONNECTION WITH THE REPLY IN FURTHER SUPPORT OF
THE REQUESTING HOLDERS' MOTION FOR ENTRY OF AN ORDER DIRECTING
THE APPOINTMENT OF AN OFFICIAL PREFERRED EQUITY COMMITTEE**

Upon the Requesting Holders' Motion (the "Motion")² for entry of an order (this "Order") pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Bankruptcy Rules 9013-1(a), 9018-1 and 9037-1, to file under seal certain information in connection with the Reply, all as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and upon any hearing held on the Motion; and all objections, if any, to the Motion having been withdrawn,

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² Capitalized terms used herein but not defined shall have the meanings ascribed to them in the Motion.

resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Requesting Holders and the Debtors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The Requesting Holders are authorized to file the Exhibits and the portions of the Reply that disclose Confidential Information (the “Sealed Information”) under seal pursuant to section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018.
3. The Requesting Holders are authorized to file a redacted version of the Reply on the Dkt. maintained in these Chapter 11 Cases.
4. The unredacted Exhibits and the portions of the Reply containing Confidential Information are confidential and shall remain under seal, and shall not be made available to anyone other than this Court, the Clerk of the Court, the United States Trustee, the Debtors, and the UCC. The United States Trustee, the Debtors, and the UCC and their advisors shall keep the Confidential Information on a strictly confidential basis. Any party who receives the Confidential Information in accordance with this Order shall not disclose or otherwise disseminate such information to any other person or entity without the prior consent of the Debtors.
5. Upon closure of the Chapter 11 Cases, the Clerk’s Office is directed to release any hard copies or electronic storage device of the Confidential Information to the Requesting Holders for disposal.
6. The Requesting Holders are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

8. This Order is granted without prejudice to the rights of any party in interest, or the United States Trustee, to seek to unseal the Sealed Information or any part of the Sealed Information.

Dated: _____, 2022
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE